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May 13, 2021

By ECF:

The Honorable Lorna G. Schofield
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Carpenter v. Tula, Inc.*, Case No. 1:21-cv-01856-LGS (S.D.N.Y.)

Dear Judge Schofield:

The undersigned represent Plaintiff Tammy Carpenter (“Plaintiff”) and Defendant TULA Life, Inc. (“Defendant”) in the above-referenced matter. We write pursuant to Rules I.B.2 of Your Honor’s Individual Rules and Procedures for Civil Cases to inform the Court that the Parties have agreed to mediate this matter with Jill Sperber, Esq. of Judicate West. The mediation is scheduled to be held on June 9, 2021. While Plaintiff will file its amended complaint on or before May 17, 2021, per the Court’s May 10, 2021, order, the Parties jointly request that: (1) the June 3 pretrial conference be adjourned; (2) Defendant’s deadline to answer, move, or otherwise respond to Plaintiff’s forthcoming First Amended Complaint (currently set for May 24, 2021) be extended until July 8, 2021, three weeks after the mediation; and (3) the Court schedule a pre-motion hearing and status conference after July 8, 2021. This is the Parties’ first request for an extension of these deadlines, and granting the relief requested herein will permit the parties to conserve resources and focus their efforts on resolving the litigation.

We appreciate the Court’s time and attention to this matter.

The application is **DENIED**. Absent extraordinary circumstances, the Court does not generally adjourn deadlines pending mediation.

Very truly yours,

/s Philip L. Fraietta

Philip L. Fraietta, Plaintiff’s Counsel

/s Ari N. Rothman

Ari N. Rothman, Defendant’s Counsel

A handwritten signature in black ink, appearing to read "LORNA G. SCHOFIELD" followed by "UNITED STATES DISTRICT JUDGE".

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE